

# EXHIBIT 29

Dennis Crawford, Vol 1

June 15, 2017

Page 1

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

IN RE SEAGATE TECHNOLOGY LLC  
LITIGATION,

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CASE NO. 5:16-CV-00523-JCS

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CONSOLIDATED ACTION,

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VIDEOTAPED DEPOSITION OF DENNIS CRAWFORD

San Francisco, California

Thursday, June 15, 2017

Reported by: Ashley Soevyn, CSR No. 12019

Job No. 2244

Pages 1 - 149

Dennis Crawford, Vol 1

June 15, 2017

<p style="text-align: right;">Page 58</p> <p>1 could not tell you exactly who.</p> <p>2 Q Okay. Do you recall comparing the</p> <p>3 warranties?</p> <p>4 A As one of the factors, yes.</p> <p>5 Q How was Seagate's warranty different, if</p> <p>6 at all?</p> <p>7 A I don't believe it was different. I</p> <p>8 believe it was on par.</p> <p>9 Q On par with Western Digital?</p> <p>10 A Yes.</p> <p>11 Q Were there marketing statements on</p> <p>12 Western Digital's websites?</p> <p>13 A There were.</p> <p>14 Q Was there anything in particular about</p> <p>15 the statements you read on Seagate's website that</p> <p>16 swayed you to choose Seagate as opposed to Western</p> <p>17 Digital?</p> <p>18 A There was a statement on Seagate's</p> <p>19 website that was not on Western Digital's because,</p> <p>20 as I testified to earlier, that this was my first</p> <p>21 time with a RAID 5. And there was a statement that</p> <p>22 said something to the effect of like it's like best</p> <p>23 for all cases, or something to that effect, and</p> <p>24 Western Digital's wasn't. Not that it wasn't the</p> <p>25 case, but it was clearly on Seagate's website.</p>	<p style="text-align: right;">Page 60</p> <p>1 Q Western Digital didn't promise</p> <p>2 reliability?</p> <p>3 A I believe that Seagate's reliability</p> <p>4 rating was slightly higher. Not by much, but the</p> <p>5 published value for failure was just slightly lower.</p> <p>6 Q The "published value for failure," what</p> <p>7 does that mean?</p> <p>8 A It's an average -- as I understand it,</p> <p>9 it's the average failure rate of a drive over a</p> <p>10 period of time. I don't know what that period of</p> <p>11 time is. But when you compare two things and it</p> <p>12 says the word "failure," you typically go with the</p> <p>13 lower value.</p> <p>14 Q Are you referring to any of the</p> <p>15 information that we reviewed that are attached to</p> <p>16 Exhibits A and B to the complaint that's been marked</p> <p>17 as Enders Exhibit 2?</p> <p>18 A This section, "Reliability/data</p> <p>19 integrity" would apply.</p> <p>20 Q Anything in particular under that</p> <p>21 heading? Now we're referring to Page 3 of 3 in</p> <p>22 Exhibit B, correct?</p> <p>23 A Three of three, Exhibit B. All these</p> <p>24 factors are attributable to how reliable a drive is.</p> <p>25 So when you have an annual failure rate of less than</p>
<p style="text-align: right;">Page 59</p> <p>1 So we're going back five and a half</p> <p>2 years. RAID was not necessarily a home technology</p> <p>3 back then. So for me to invest in it, I needed a</p> <p>4 level of comfort that the drives would be suitable</p> <p>5 for that.</p> <p>6 Q You recall something to the effect of its</p> <p>7 best for all cases on Seagate's website?</p> <p>8 A I can't recall the exact term, but there</p> <p>9 was something that indicated that it wasn't just for</p> <p>10 home computers, that it was suitable for all</p> <p>11 scenarios, including RAID.</p> <p>12 Q And Western Digital didn't say anything</p> <p>13 about RAID?</p> <p>14 A I didn't see anything on Western</p> <p>15 Digital's website that immediately indicated that</p> <p>16 they were. They may have been, but it wasn't</p> <p>17 prominent on their website.</p> <p>18 Q Is that the only thing that you recall</p> <p>19 differentiating between Western Digital and Seagate</p> <p>20 in 2012 when you were purchasing the drives was the</p> <p>21 reference to RAID?</p> <p>22 A There was other differences. Without</p> <p>23 having the two data sheets in front of me, it would</p> <p>24 be very difficult for me to tell you what they are.</p> <p>25 But it was -- reliability was the big one.</p>	<p style="text-align: right;">Page 61</p> <p>1 1 percent, that seems pretty good.</p> <p>2 And I purchased three drives, one of</p> <p>3 which was dead on arrival. And as the testimony,</p> <p>4 you know, I provided, they kept failing. So that to</p> <p>5 me does not seem like less than 1 percent unless --</p> <p>6 unless I'm the unluckiest person in the world. But</p> <p>7 these values are what you would compare drive A with</p> <p>8 drive B.</p> <p>9 Q What did you recall Western Digital's</p> <p>10 data sheet that differentiated from Seagate's?</p> <p>11 A Like I said, without Western Digital's in</p> <p>12 front of me I really can't -- I can't state. But</p> <p>13 like any consumer, I looked at their data sheets. I</p> <p>14 looked at Seagate's data sheets. And if one was</p> <p>15 slightly better, I usually make my decision based on</p> <p>16 that.</p> <p>17 Q Under "Reliability/data integrity," you</p> <p>18 refer to line, "Annualized failure rate AFR"?</p> <p>19 A Uh-huh.</p> <p>20 Q And it says, "less than 1 percent."</p> <p>21 A Uh-huh.</p> <p>22 Q What did it say on WD's website?</p> <p>23 A Again, without the data sheet in front of</p> <p>24 me I couldn't tell you.</p> <p>25 Q And it's your belief that Seagate's value</p>

Dennis Crawford, Vol 1

June 15, 2017

<p style="text-align: right;">Page 146</p> <p>1 network-attached storage drives was listed as</p> <p>2 best-fit application on the first page of Barracuda</p> <p>3 data sheet?</p> <p>4 MS. MCLEAN: Objection. Leading.</p> <p>5 THE WITNESS: I did.</p> <p>6 MR. PIERCE: Did you rely on the</p> <p>7 statements that the Barracuda was best fit for both</p> <p>8 desktop RAID and network-attached storage devices</p> <p>9 before making your decision to purchase the</p> <p>10 Barracuda hard drives?</p> <p>11 MS. MCLEAN: Objection. Compound.</p> <p>12 THE WITNESS: I utilized the list of</p> <p>13 Seagate's provided best-fit applications when making</p> <p>14 my selection.</p> <p>15 MR. PIERCE: Would you have purchased</p> <p>16 Barracuda hard drives if you didn't think they were</p> <p>17 a best fit for a network-attached storage device?</p> <p>18 A Absolutely not.</p> <p>19 Q Turning to the second page of the</p> <p>20 document, the data sheet. Did you look at the</p> <p>21 annualized failure rate listed on this second page</p> <p>22 of the Barracuda data sheet?</p> <p>23 A I did.</p> <p>24 Q Did you rely on the listed annualized</p> <p>25 failure rate on the Barracuda data sheet before</p>	<p style="text-align: right;">Page 148</p> <p>1 I, ASHLEY SOEVYN, do hereby declare under</p> <p>2 penalty of perjury that I have read the foregoing</p> <p>3 transcript; that I have made any corrections as</p> <p>4 appear noted, in ink, initialed by me, or attached</p> <p>5 hereto; that my testimony as contained herein, as</p> <p>6 corrected, is true and correct.</p> <p>7 EXECUTED this _____ day</p> <p>8 of _____,</p> <p>9 20____, at _____, _____.</p> <p style="text-align: center;">(City) (State)</p> <p>10</p> <p>11</p> <p>12</p> <p>13 _____</p> <p>14 ASHLEY SOEVYN</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 147</p> <p>1 making a decision to purchase the Barracuda hard</p> <p>2 drives?</p> <p>3 A I did.</p> <p>4 Q Would you have purchased the Barracuda</p> <p>5 hard drives if you thought the annualized failure</p> <p>6 rate was significantly higher than the percentage</p> <p>7 listed on this page?</p> <p>8 A You couldn't have paid me to take them.</p> <p>9 MR. PIERCE: No further questions.</p> <p>10 MS. MCLEAN: Okay.</p> <p>11 THE VIDEOGRAPHER: We're done?</p> <p>12 MS. MCLEAN: Yup, I believe so.</p> <p>13 THE VIDEOGRAPHER: This marks the end to</p> <p>14 DVD No. 3 of 3 in the videotaped deposition of</p> <p>15 Dennis Crawford and concludes today's testimony.</p> <p>16 The time is 3:43 p.m. and we are off the record.</p> <p>17</p> <p>18 (TIME NOTED: 3:43 p.m.)</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 149</p> <p>1 I, the undersigned, a Certified Shorthand</p> <p>2 Reporter of the State of California, do hereby</p> <p>3 certify:</p> <p>4 That the foregoing proceedings were taken</p> <p>5 before me at the time and place herein set forth;</p> <p>6 that any witnesses in the foregoing proceedings,</p> <p>7 prior to testifying, were duly sworn; that a record</p> <p>8 of the proceedings was made by me using machine</p> <p>9 shorthand, which was thereafter transcribed under my</p> <p>10 direction; further, that the foregoing is a true</p> <p>11 record of the testimony given.</p> <p>12 I further certify I am neither financially</p> <p>13 interested in the action nor a relative or employee</p> <p>14 of any attorney or party to this action.</p> <p>15 IN WITNESS WHEREOF, I have this date</p> <p>16 subscribed my name.</p> <p>17</p> <p>18 Dated: _____</p> <p>19</p> <p>20</p> <p>21</p> <p>22 <u>Ashley Soevyn</u></p> <p>23 ASHLEY SOEVYN</p> <p>24 CSR No. 12019</p> <p>25</p>